



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

April 18, 2007



Dear Environmental Professionals, Responsible Parties, and Interested Parties:

The Connecticut Department of Environmental Protection (CTDEP) has been working to improve the quality and consistency of analytical data used to support remediation projects statewide. Improvements in data quality and consistency will help speed CTDEP review and acceptance of analytical data being presented by environmental professionals and responsible parties. These improvements will also help environmental professionals make technical decisions regarding data quality and reduce the frequency of instances where additional sampling and data production may be required subsequent to an initial submittal to the CTDEP.

The CTDEP Quality Assurance/Quality Control Work Group (the work group) was established in 2004 to assist and advise the CTDEP in these efforts. Considerable progress has been made thanks in a large part to the dedication of this work group comprised of licensed environmental professionals, data validators, representatives from private laboratories, the Connecticut Department of Public Health, the U.S. Environmental Protection Agency, and the CTDEP. The CTDEP has finalized guidance documents on this important subject. I encourage you to begin planning for its implementation in the coming months.

DEP expects that responsible parties and environmental professionals ensure that the analytical data used for environmental investigation and remediation projects are of a known and sufficient level of quality. To facilitate this process, the work group has developed the Reasonable Confidence Protocols (RCPs). The RCPs are analytical procedures that include enhanced laboratory quality assurance and quality control (QA/QC) criteria. The RCPs were developed to provide guidelines for the type of QA/QC documentation that will be expected for analytical laboratory data used by environmental professionals. Other components of this guidance include a laboratory QA/QC certification form to indicate if the data meets the guidelines for Reasonable Confidence. When Reasonable Confidence is achieved for a particular data set, the environmental professional will have Reasonable Confidence that the laboratory has followed the RCPs, has described non-conformances, if any, and has adequate information to make judgments regarding data quality. This will speed CTDEP review and reduce unanticipated requests for additional data quality information.

The environmental professional has the responsibility to evaluate the usability of the data. Reasonable Confidence can form the basis for the review of the analytical data by the environmental professional to determine if the data is acceptable for the intended purpose.

For samples collected on or after September 1, 2007, the CTDEP expects that all analytical data used to support remediation projects be generated using the RCPs (or methodologies that contain a level of quality control and documentation at least equivalent to the RCPs). The environmental professional is advised that the use of non-RCP methods for samples collected on or after September 1, 2007 may involve the commitment of significant resources to demonstrate an equivalency with the RCPs. Submittals to the CTDEP of data generated by methods other than the RCPs should be accompanied by adequate documentation and opinions as to how the methods are equivalent to, or exceed, the level of quality control and documentation in the RCP methods. These submittals, will of necessity, receive careful evaluation.

The CTDEP recommends that planning for these coming events begin now. At a minimum, environmental professionals should communicate with their analytical service provider(s) to ensure that they are familiar with, and able to run the RCP methods. The RCPs and related forms are available on the CTDEP website at

<http://www.ct.gov/dep/cwp/view.asp?A=2715&Q=324958>.

Additional training regarding the RCPs will be provided by CTDEP before September 1, 2007. The RCPs will be included in the CTDEP's "Site Characterization Guidance Document." If you have any questions, please contact Peter Hill who is representing the Division in this matter at 860-424-3912 or peter.hill@po.state.ct.us.

Sincerely,



Patrick F. Bowe

Director

Bureau of Water Protection and Land Reuse

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